

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE  
GRABLIS, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

-against-

ONECOIN LTD.; RUJA IGNATOVA,  
KONSTANTIN IGNATOV; SEBASTIAN  
GREENWOOD; and MARK SCOTT,

Defendants.

Case No.: 1:19-cv-04074-VEC

Hon. Valerie E. Caproni

**[PROPOSED] ORDER GRANTING LEAD PLAINTIFF DONALD BERDEAUX'S  
MOTION FOR APPROVAL OF SELECTION OF CO-LEAD COUNSEL**

THIS COURT, having considered the papers filed in support of the Motion of Lead Donald Berdeaux ("Berdeaux") for entry of an Order: (i) approving Berdeaux's selection of Silver Miller and Levi & Korsinsky, LLP ("Levi & Korsinsky") as Co-Lead Counsel pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v); and (ii) granting such other and further relief as the Court may deem just and proper; and for good cause shown, the Court hereby enters the following Order:

**APPOINTMENT OF CO-LEAD COUNSEL**

1. Pursuant to Section 27(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 77z-1(a)(3)(B)(v), Lead Plaintiff Berdeaux has selected and retained the law firms Silver Miller and Levi & Korsinsky, LLP to serve as Co-Lead Counsel. The Court approves Lead Plaintiff Berdeaux's selection of Co-Lead Counsel for the Action

2. Co-Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Co-Lead Counsel shall designate:

- (a) to coordinate the briefing and argument of any and all motions;
- (b) to coordinate the conduct of any and all discovery proceedings;
- (c) to coordinate the examination of any and all witnesses in depositions;
- (d) to coordinate the selection of counsel to act as spokesperson at all pretrial conferences;
- (e) to call meetings of the plaintiffs' counsel as they deem necessary and appropriate from time to time;
- (f) to coordinate all settlement negotiations with counsel for Defendants;
- (g) to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and to delegate work responsibilities to selected counsel as may be required;
- (h) to coordinate the preparation and filings of all pleadings; and
- (i) to supervise all other matters concerning the prosecution or resolution of the claims asserted in the Action.

3. No motion, discovery request, or other pretrial proceedings shall be initiated or filed by any plaintiffs without the approval of Co-Lead Counsel, so as to prevent duplicative pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of the Co-Lead Counsel.

4. Service upon any plaintiff of all pleadings, motions, or other papers in the Action, except those specifically addressed to a plaintiff other than Lead Plaintiffs, shall be completed upon service of Co-Lead Counsel.

5. Co-Lead Counsel shall be the spokespersons for all plaintiffs' counsel and shall direct and coordinate the activities of plaintiffs' counsel. Co-Lead Counsel shall be the contact between the Court and plaintiffs and their counsel.

**ORDERED AND ADJUDGED** that Lead Plaintiff Berdeaux's Motion for Approval of Selection of Co-Lead Counsel is **GRANTED**.

**DONE AND ORDERED** in Chambers in New York, New York on this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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**HONORABLE VALERIE E. CAPRONI**  
**UNITED STATES DISTRICT COURT JUDGE**